



OFFICE OF THE MAYOR

SUNSHINE PERIOD

87-268

CITY OF CASPER

200 NORTH DAVID

CASPER, WYOMING 82601

DOCKET FILE COPY ORIGINAL

March 27, 1997

Reed Hundt, Chairman  
Federal Communications Commissioners  
1919 "M" Street, N.W.  
Washington, D.C. 20554

Dear Chairman Hundt:

The FCC is currently considering the adoption of a Digital Television (DTV) channel allotment which would permit the reallocation to other services of spectrum now reserved for UHF-TV channels 60-69. Both President Clinton and Senator John McCain have proposed that four of those channels (i.e., 24 MHz) be allocated for state and local government public safety use. We strongly support such an allocation, which would be consistent with the recommendations of the Public Safety Wireless Advisory Committee (PSWAC). Unfortunately, we understand that some members of the broadcasting community have suggested that any reallocation of the channel 60-69 spectrum should be delayed for several years.

The Commission must not delay any further in addressing public safety spectrum needs. State and local government public safety agencies have been waiting for over ten years for the Commission to address the spectrum needs that the Commission staff itself identified in 1984. More recently, the PSWAC concluded that "unless immediate measures are taken to alleviate spectrum shortfalls and promote interoperability, Public Safety agencies will not be able to adequately discharge their obligations to protect life and property in a safe, efficient, and cost-effective manner.

The time to act is now, not in two or three years. Every day that the Commission delays is a day that police, fire, EMS, and other public safety personnel must face continued frequency congestion, insufficient interoperability, and the inability to implement new public safety communications technologies.

The PSWAC Spectrum Requirements Subcommittee concluded that "at least 25 MHz of spectrum should be allocated immediately to alleviate capacity shortfalls for critical voice and data needs and to promote development of equipment for new services". To do that, the following actions must be taken:

- The FCC must conduct and complete a rulemaking to reallocate the spectrum.
- The FCC must conduct and complete a rulemaking to adopt rules for the use and assignment of the reallocated spectrum.
- Public Safety agencies and organizations must plan and coordinate allotment of channels.

No. of Copies rec'd 0  
List ABCDE

Federal Communications Commission

March 27, 1997

Page Two

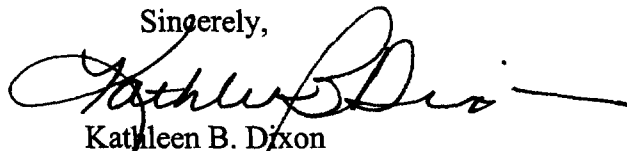
- Equipment vendors must modify or develop equipment to operate in the reallocated spectrum (while not a major problem due to the proximity to the 800 MHZ band, this process still takes time).
- Applications must be filed and processed by the Commission.
- Agencies must fund the development of new systems.
- New systems must be constructed and put into operation.

This process will not be completed overnight. Therefore, the Commission must allocate the spectrum now so that the implementation of that spectrum for public safety purposes can begin as soon as possible.

Finally, we also urge the Commission to adopt a DTV channel allotment plan which eliminates or at least minimizes the number of interim DTV allotments in channels 60-69. That would greatly accelerate the ability of public safety to implement new operations with these channels long before the end of the DTV transition.

Thank you for your consideration.

Sincerely,



Kathleen B. Dixon  
Mayor




Ed Opelha, Councilman




Rich Wilson, Councilman



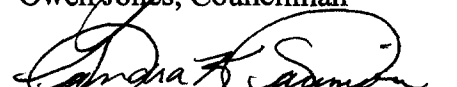
Carol Crump, Councilman



Tim Monroe, Councilman




Owen Jones, Councilman



Sandra K. Larimore, Councilman



George H. Parks, Councilman



Dr. Thomas Walsh, Councilman

OFFICE OF THE MAYOR  
**CITY OF CASPER**  
CASPER, WYOMING



Reed Hunt, Chairman  
Federal Communications Commissioners  
1919 "M" Street, N.W.  
Washington, D.C. 20554

MAIL ROOM

APR 07 1997

RECEIVED

